MR. GANSERT: But I do think to say--

MS. FARROBA: That's okay.

MR. REEL: I think you answered the question.

MR. STANSHINE: Again, this is about dark fiber and splicing or not splicing, and it's a hypothetical question. I'm asking technical feasibility, not legality.

And imagine, if you will, you are in the business district of a city, you say the avenues run east and west and the streets run north and south, and Verizon has a central office at 10th Street and Third Avenue, and they have another central office at 20th Street and Third Avenue. So, you're running through some kind of trunk grid running Third Avenue from 10th to 20th. Say hypothetically you got a 96-strand ribbon running between the two buildings.

Now, a customer, a retail customer--biggie--at 13th Street and Third Avenue comes in and said, "I want a fiber loop over to 10th Street." Say that's a serving office. Do you

require that customer to pay the construction costs for another cable to get fiber from 10th Street over to 13th Street, or do you somehow find, assuming that there are some unused strands in the 96 strands of cable running from 10th to 20th, you find a way to break in and use some of them? Or does he have to pay for construction of a new cable?

MS. DETCH: I could answer that.

MR. GANSERT: I was going to say the first answer is someone accuses engineers of always giving this answer: It depends. I think that typically in that kind of environment we would have laid out the feeder cable for fiber in such a way that we are serving most major locations, and typically the first means of serving such a customer would be to try to exploit the infrastructure that's already been built. I think you could get to a point where some segment where you just don't have that fiber that hasn't been built yet, and maybe Margaret could talk about what the option of the customers are.

You could imagine a situation where there just wasn't any, but more typically you would have planned the main infrastructure so that fiber would be available to the location.

MR. STANSHINE: So, for now let's say we got--my scenario is we had a 96-strand cable from 10th Street to 20th Street. Say hypothetically you're using 48 strands are lit, 48 are dark. Customer comes in at 13th Street and says, "I want four fibers, I want to set up" whatever he wants "from 13th over to 10th."

Now, does this count as having available fiber by your definition, or not?

MS. DETCH: Well, the fundamental issue is if the customer put in an inquiry, say, with their address at 13th Street and at 10th or their address at 13th and 20th, the key would be is there fiber from that route on the street that is already terminated into that end-user building? And if there was, how much fiber is there available to meet? Often, you have 96-strand fiber cable down the street, but they may only pull in 24--12 or 24

fibers into that building.

So, assuming that there is a 24-count and four is available, they could order that. That would be looped between the Verizon office and the customer premise.

Now, if there was no fiber in that customer premise, the next thing would be, well, is there a portion of the loop between the office on 10th Street--I mean, at the 10th and 20th with an accessible terminal, and they could come in and access the portion of the subloop, they, though, would have to construct their own fiber or lease from another provider between our accessible terminal and their final point of destination. It would not construct new fiber if it wasn't in place.

MS. FARROBA: But the end user would have to construct their own fiber?

MS. DETCH: If we didn't have fiber directly to the end user, we wouldn't construct it from unbundled dark fiber, no.

MR. STANSHINE: Okay. So, the key to you

is whether you have got--basically the only accessible terminals you're saying are at 10th and 20th, the customer has to find a way to get over there and pay for construction?

MS. DETCH: In other words, if there is no accessible terminal along the portion of the loop?

MR. STANSHINE: Yes.

MS. DETCH: Correct.

MR. STANSHINE: If the closest thing is to the two COs, the customer would have to either pay for construction or construct his own facility.

MS. DETCH: Correct, because we wouldn't have existing fiber readily called into service between the two points that they are requesting.

MR. STANSHINE: I guess the customer, even if it's a CLEC, could they find out where your accessible points are?

MS. DETCH: There is a process, and I could only speak at a high level. You need one of the co-location people to discuss it, but under co-location there is a product called "CORT," C-O-R-T--and I don't know what the acronym is--that

they could ask--they could look at Verizon's wire serving center in which they are interested in co-location outside the serving wire center, and they would be given a list, I guess, of all the remote terminals and huts and CNVs where they could co-locate. So, that would give them an area where they could get it at portions of the loop.

And then the key from that is, can you co-locate, and then they put in a dark fiber and make sure there is fiber in the portions of the loop in which they are interested.

So, it would be partially through co-location to find out where accessible terminals are. And then once that's determined through the dark fiber inquiry process, you would find out if there's actually dark fiber available.

MR. STANSHINE: Does that somehow meet the needs of CLECs or WorldCom? What else would you do?

MR. LATHROP: Well, if there are fiber going from 10th to 20th Street and we had a facility at 13th or a customer at 13th, we would

want to be able to access that fiber that in your hypothetical sounded like was somehow available. I'm not familiar with the product C-O-R-T, the CORT product. It sounds sort of like an adjacent co-location, so that Verizon may be proposing that the way to access the fiber in that circumstance would be to co-locate essentially an adjacent co-location where your co-location facility is at 13th and their facility is at 10th, and you extend the fiber from one place to another.

Given the time required to get that up and running, it would seem like there may be a faster approach.

One item that isn't listed in Verizon's proposed language that Verizon may say appears elsewhere, but I haven't seen it, is customer-to-customer location for dark fiber. They mentioned in your earlier question a customer at a central office--mentioned remote terminal in their testimony. That doesn't appear here, but I guess it is covered by a remote terminal paragraph, but not--I don't think it covers customer-to-customer

locations. There may be other approaches to obtaining fiber for the customers or the CLEC than Verizon includes in its proposed language.

MR. ROUSEY: I would like to touch real quick on the CORT product that was mentioned here. The purpose of that product is if a competitive company comes in to a Verizon exchange and knows a central office area that they are attempting to solicit customers at, market customers at--whatever--the CORT Report is a methodology of identifying--it's an inquiry that will help identify the remote terminals that subtend a given central office, and there are other forms available or types of request even to take that further down into the network as locations of FDIs, et cetera. So, that's kind of the purpose of the central office remote terminal report.

For instance, I have--Verizon has a central office here. I, as a competitor, want to know where you're subtending remote terminals behind that given central office service addresses or "silly" codes, that type of information.

MR. STANSHINE: These are DLC remote terminals you're talking about?

MR. ROUSEY: Yes.

MR. STANSHINE: Now, if they want to know about accessible points for accessing fiber, they could get an identification of listing of points other than at the two end points other than--sorry--the two COs, where the fiber is accessible.

Again--is that also part of the CORT Report?

MR. ROUSEY: The CORT Report--and again, it's kind of a separate process--is, for instance--and I'm just going to use an analogy here--if I were to go in and presumably I want to see if we use points A and points B that we used before. Point A might be a Verizon central office. Point B could be a remote terminal subtending that particular Verizon office, and say I want to go in to request--in order to try to find if there is dark fiber between those two points, I need two things. I need to know the central office location

so what information to provide to Verizon through the dark fiber inquiry process, whatever the name is, I need to know that point. Plus, I also have to tell Verizon okay, what's the address of point B? Where is that remote terminal located at? The CORT process gives them that information.

MR. STANSHINE: What if they're not asking about remote terminals, but trying to find accessible fiber terminals?

MS. DETCH: The fiber terminals would be located in a remote terminal or CEV or hut.

MS. FARROBA: I thought you said in office building, too. I mean, you have got fiber going to the office building.

MS. DETCH: I was answering his example, though, if the fiber didn't go into, say, the 13th, how would they find at what point it would be on the loop, and that would be through the CORT.

But if you go to the office building and put the dark fiber inquiry in, then we could tell between those two points if there is fiber there terminated to an accessible terminal.

MR. STANSHINE: So, if I wanted to know a list of accessible points for accessing your fiber network in the areas serving a given CO, I would ask for the CORT Report on that CO, and that will identify all the points where there accessible termination for the fiber?

MS. DETCH: No. The CORT Report is just telling you where Verizon's premises are on portions of the loop are remote terminals, CEVs, and huts. From that, the CLEC could map out, as they map out where they're going, what would be the best terminal for them to get to their desired location, and they could then put in their dark fiber inquiry.

MR. STANSHINE: So, when they got the CORT Report, it includes identification of all the places where they could access the glass?

MS. DETCH: No. It has nothing to do with the fiber.

MR. STANSHINE: There is some kind of inferential process. After they get the list of RT locations, they should then assume that fiber is

accessible at or near the RT and nowhere else in the area served by the CO? And hopefully if they're right, that's great.

MR. GANSERT: From a logical point of view and going back to your hypothetical, I think if you actually know a large business location, the logical first thing to do is to find out if there's fiber to that. If there isn't fiber there, then really the next logical place to pick it up is going to be a remote terminal somewhere. You're not going to be able to pick it up in another building, another customer location.

MR. STANSHINE: But if the regular retail customer who wasn't at one of those buildings called you, presumably Verizon would try to find something to serve that customer. You wouldn't tell them to construct it yourself. You would find the closest place for him.

MR. GANSERT: But I think the logic would be identical.

MR. STANSHINE: Verizon would do it for him as opposed to--

MR. GANSERT: No, I'm saying the logic would be identical. If somebody--if you were looking at a customer in a particular location, the first thing you would check is do we have fiber in that building? And in the scenario you just painted, you will find that is true for a significant part of the time because in most large business locations we have fiber. And then if that's not true, then what you would be looking at is where is the nearest fiber, and if it's not inside the building, it's a remote terminal or not there.

MS. FARROBA: Can I ask a quick question to WorldCom, really.

How often would this situation come up? I mean, it seems like what Verizon is saying is they try to anticipate and plan out the network by putting fiber in place to bid office buildings, so what's the likelihood that you're going to be requesting fiber and not be there for a big office building?

MR. LATHROP: That may occur in limited

circumstances, and I guess our opposition is more to the restrictions on the availability of dark fiber and locations where we can access it.

MS. FARROBA: I guess in what type of scenario?

MR. DYGART: Has there been an instance you are all aware of where you have been coming out of one of these large buildings like we're discussing, you have a customer there, but there is no Verizon fiber to that building and you are denied the option of splicing into the fiber outside the building?

MR. LATHROP: No, there is no situation I'm aware of this sort.

MR. DYGART: But that's the situation envisioned by this provision that you're proposing? Or by your opposition to Verizon's language?

MR. GOLDFARB: I think it's a bit broader than that. It has to do with the generic ability to identify where there might be--where the connection can be made, specifically where we, of course, are seeking splice places where there might

be splice points and we might be able to meet at a splice point. We have had that experience in our negotiations with another Bell company, with Bell South, where we have reached agreement on that.

And it's not so much trying to respond to a specific example that may have occurred in Virginia, but generically in being able to move forward and understand what our possibilities are, since we know that with another Bell company there was a willingness to identify that we could come in and splice at the end points and the end points are defined more broadly than Verizon is seeking to have them defined. So, that's what we would like to see, the same flexibility, going forward.

MR. DYGART: Just so I understand your position, if Verizon has done its job of forecasting perfectly and it's run all the fiber that it needs to all the locations where you may serve customers, this issue falls away?

MR. GOLDFARB: Well, it doesn't exactly fall away because--remember: It is putting in fiber that will be optimized for its network, and

there may be--our locations will be different, so it will be optimizing its network and may have optimized things for itself. But that may not be what is optimal for us.

And what we need to have is wherever there is a technically feasible interconnection point to be able to have that, and given that there's other ILECs, Bell South, that recognizes a technically feasible interconnection points potentially for splice points and Verizon is indicating that it's not, we don't want to be able--to be foreclosed from that opportunity.

MR. DYGART: Thank you.

MS. DETCH: Could I make a slight comment on that?

Verizon's offering with no access at splice points is at parity with how we offer our other service. In the instance you brought up, if there is no fiber into the building, Verizon would never splice out two strands from a cable to go to a customer building.

If it brought fiber into the customer

building, it would construct and install one or more cables to meet the anticipated demand not only for that particular customer at that moment, but expectation over time.

We just don't do that. We don't splice out two and four strands. If we splice, it's because we are constructing and adding on to a route to create a bigger route.

MS. FARROBA: I guess I had asked that question earlier and was told that you would never splice out and send fiber to a building, that once you had the fiber in place, you were not going to come in and splice out to a building, and now you're saying that you would do that.

MS. DETCH: No. Actually, what Joe--and he could get into more depth, but in his testimony when he gave you the first scenario, he very specifically talked about partially constructed where they bring so much fiber and then stub it out, because I think your testimony specifically said, for instance, if you knew there was an office building coming in in the next year as we were

constructing down this avenue, if we knew the office building was coming, they would specifically stub out so that when they constructed the next segment, they could continue the job.

MS. FARROBA: You would open the splice case at that point?

MS. DETCH: That would be--that fiber at that point--that partially constructed fiber is part of an ongoing construction for a planned route. And the first one scenario, partially constructed, if we were building that portion as part of a route that was being built in stages, that wouldn't be available to anybody until the entire route was complete.

MS. FARROBA: Right, but what I'm asking is, at some point you're going back into that splice case?

MR. GANSERT: No. The stubbing is done so you could add the other cable without having to disturb the main splice. That's the whole idea of pre-positioning splice.

What Margaret is describing--and again,

the hypothetical gets to be a little bit difficult to deal with, but typically if a customer is requesting fiber, what we are saying is we are not going to construct--we are not going to be able to offer that service if we don't have planned construction that's going to do that, we are not going to say, "Gee, we forgot that building."

MS. FARROBA: Could you explain technically what this stubbing of the fiber is? What's going on there? You got the splice case? What does that look like?

MR. GANSERT: Well, take, for example--as Margaret said, our policy is to use minimum size cable you run into a building would be 12 or 24 fiber, either--I think the policy now is really 24.

So, what we are saying is you have the larger cable with some multiple of 12 fibers in it. When you get to the logical entrance or manhole or access point to that building--usually it's a manhole--and you're going to splice there anyway, you would splice the through-ribbons together in the main splice, and you would also splice in a

piece, in effect, of the smaller cable, the 24 fiber cable, and you would have--you might even have part of it rolled up or left there, but at minimum you're going to have a piece which is what we call a "stub" that's ready to be spliced to the continuing 24 pair cable, and that would complete the construction.

When the stub is finished, and it's sealed, you essentially have two splices: You have the branch and the main cable. But the main splice of the fibers you don't ever touch again, if at all possible.

MS. DETCH: And that's when you got into a second scenario where you had different cable sizes and some--you didn't use--and that's where you said you would not go back in and breach those--

MR. GANSERT: Yeah, any of those would be in the main splice and would be left there.

MR. REEL: I have a couple of followup questions, and they're not about splice case and termination points.

First, I would like to ask AT&T about

unused transmission media in the place of the word "fiber," and you talked about how unused coaxial cable is analogous to unused copper or fiber; is that correct?

MR. NURSE: I'm glad you asked about that section; that can be a little confusing. And our intention there was to follow the UNE Remand Order where the Commission said it was their intention to essentially make the loop technology, in their definition of loop technology, neutral.

MR. REEL: Right, but I just want to know if I have it straight that you think coaxial cable is analogous to unused copper or unused fiber.

MR. NURSE: Yes.

MR. REEL: I want to ask if Verizon agrees that unused coaxial cable is analogous to unused copper or unused fiber.

MR. GANSERT: I guess it's kind of a philosophic question, isn't it? Unused capacity and used capacity.

MR. REEL: That's fine. Used capacity, unused capacity.

MR. GANSERT: I think the point--you could say that the unused part of a copper cable is dark copper, I guess, or coax.

MR. REEL: That's all on that that I wanted to ask.

This question is also for AT&T and WorldCom. Assuming that Verizon is not permitted to reserve fiber to its use except for immediate jobs that it already has orders for, but not--would you also accept that it's simply first-come-first-serve basis?

MR. NURSE: No. I'm actually kind of concerned about this. I'm also concerned about impression that might be left from the errata sheet that went around. In this testimony there was discussion about he said/she said about whether Verizon reserved dark fiber for its future growth and whether they were discriminatory and not letting us do that. So, Verizon filed their errata sheet where they struck "or for future growth."

Well, what changed? Was that words that changed? Did action change? And the problem is

that Verizon doesn't--has an opportunity to reserve not dark fiber as they define it for the future growth, but to define fiber that's not lit that's not dark fiber, because you take fiber that doesn't have a terminator on the end. You run fiber to a building, you terminate 96 of the fibers, and it's 144 fiber cable. What are the other 48 fibers that are not lit? In Verizon's contorted view, I think, those are not dark fiber UNEs because they are not terminated on both ends, and they are not continuously spliced through.

I mean, where you started with this is that dark fiber is cross-elastic highly priced special access services, and Verizon would like to keep that special access revenue up. In their comments in the UNE Remand, they proposed making this a UNE, and now they have come in through the contract stuff and by very narrowly constraining it and not saying, "Look, dark fiber you put in your plant are you put in your string, you put in your conduit, that's what this dark fiber is," they start to add on it has to be continuously spliced,

it has to have terminators on the end and the terminators have to be plugged into a terminal.

MR. REEL: I think you are kind of getting away from the gist of my question, which was simply: Does AT&T believe it should be able to reserve dark fiber?

MR. NURSE: Yes. And there is a very specific need. Our reservation was not for years. This is a Catch-22. This came up in the Pennsylvania hearings where it was impacting some small carriers. In order to order fiber into a co-location site, you have to have a fiber termination panel. If you need to augment your panel, you have to go through the co-location augment process. So, if you're going to expand your network out, you want to check, is there dark fiber there. If there's dark fiber there, you want to get co-location. If you want co-location, you want to get your fire determination panel built out.

When you put the query in to see if there is dark fiber, you see that there is dark fiber

there. But until you have the ordering information, the CFA to order it, you can't order it. And what was happening to carriers is they would put there request in, find dark fiber, wouldn't be able to order it, put their co-location augment in. And when they would put their co-location augment by Verizon would be done, then the fiber would be gone.

So, it's Catch-22.

MR. REEL: How much of a time lapse is this? Are you simply saying you would need to be able to hold on to the fiber for 90 days?

MR. NURSE: Ninety days.

So, I think that's a reasonable balance. If we check that the facility is there and we go and undertake the other operations and co-los that we need to do, that the fiber is still there so we could put it in. It's not like we want to lock it up for an eternity.

MR. REEL: It's a matter of reliance, then.

MS. DETCH: I could comment on that.

That's a very good recap of one of the things that happened in the PA Commission, but what Mr. Nurse has left out--

MS. FARROBA: Well, is that your position though?

MS. DETCH: No. What we actually agreed do in PA, and if it can be mechanized, rolled out, is in that specific instance, we have been in the process all summer, we already had one report filed with the commission of performing what's known as parallel provisioning trial to address that issue. What Mr. Nurse brought up is an issue that impacts all UNEs. For any UNE you had to wait until your co-location arrangement is built before you could put in an order for a UNE, so that's not anything unique to dark fiber.

MS. FARROBA: You still have that now?

MS. DETCH: The process that they are trialing now is that the CLEC will submit their co-location application. And when it's approved they have space, at the same time they could submit a dark fiber order, and we will begin to

parallel-provision the dark fiber so that when the co-location cage is complete, the dark fiber is provisioned--I think it's within 10 days or so after they have the co-location arrangement, but the fiber is assigned after they have received approval to the application and they have committed to the buildout.

So, that way it's not--

MS. FARROBA: Let me ask on that: If they put in an application or request for co-location, you said you could start the parallel provisioning once there is a determination there is space, so that should only take 10 days; right?

MS. DETCH: I'm not sure what the exact interval is in PA, but I think it's around that same time frame.

MR. NURSE: You asked for the space for them to come back and tell you whether there's the space. It's in that order to actually get the space to get the augment. Those intervals are more in the nature of 90 days.

But the point is we were looking

for--Verizon said, "Don't like CLECs reserve space because they will horde it or crowd it out." We are looking for a commercially reasonable interval that let's us get the fiber, make a plan and then work other logistics on the other one.

There is a whole menu of what all those could be, but I think that you could easily see that in 90 days there are steps that you would have to take without hording the market or crowding out other CLECs or other doomsday scenarios.

MS. DETCH: And the purpose of that trial was to do that. Once they put in the firm application for co-location, their space, they say Verizon build it, we will at that point accept the firm order for unbundled dark fiber.

MR. NURSE: Are you offering to do that here now?

MS. DETCH: The offer in Pennsylvania.

MR. GARY: She's going to ask you the question.

MS. DETCH: The offer in Pennsylvania is, if the trial is successful and update so far is

that it is, Verizon will move forward to mechanize the system because it's done very manually to enable this to happen, and roll it out across footprints.

MR. REEL: You're not--

MS. FARROBA: Just a second, though. You will roll it out across the footprint in a mechanized form. So, in Virginia that would be when?

MS. DETCH: I don't know because they're still finishing the trial. I would have to find out.

MS. FARROBA: So, you're saying you wouldn't do it in Virginia on a manual basis pursuant to this agreement?

MS. DETCH: Unless we do a trial in Virginia. I think the issue is there would be so many orders that it would be hard to do it manually. Right now in the trial, the order can't flow through mechanized. We have to have a team involved to ensure that the fiber is assigned. What they actually do is load a dummy CFA because a

CFA assignment is not given typically until 10 days prior to the cage turning up, and then at that point we could load the assigned CFA, and everything can flow through. But up until that point, it's highly manual. We have a rep or two dedicated to the customer in the trial that calls the folks to be aware this order is coming because normally it just won't flow through the system. It will kick out.

MS. FARROBA: Let me ask a clarifying question, and we will move on soon. But you brought up what was being done in Texas on the 25 percent issue.

MS. DETCH: Correct.

MS. FARROBA: So I'm wondering, are you doing the parallel provisioning pursuant to your Interconnection Agreements in Texas right now?

MS. DETCH: No. The trial is only being performed, to my knowledge, in Pennsylvania.

MS. FARROBA: So, it's not available there right now?

MS. DETCH: The parallel provision trial?

MS. FARROBA: Yes.

MS. DETCH: No.

MR. NURSE: But I don't believe there is a commitment from Verizon to do the parallel provision--

MR. DYGART: Please, we could move on now. Thank you.

MR. REEL: I'm confused on a point. Are you telling me that Verizon contemplates reserving 25 percent of its dark fiber to itself?

MS. DETCH: Not at all. What this point is saying is any one CLEC can't come in and order greater than 25 percent of the available dark fiber between any two points--in order, not reserve--where a CLEC leasing a maximum of 25 percent of the dark fiber in any given segment.

MR. PFAU: Could I ask a question on that?

MR. DYGART: No.

MR. REEL: But I'm confused about why it's difficult for Verizon to hold on to enough dark fiber for a CLEC's need for 90 days?

MS. DETCH: For reservation system?

MR. REEL: Yes.

Once the--even assuming manual processes, why is it difficult for Verizon to allot that dark fiber and reserve it for 90 days while the co-location occurs?

MS. DETCH: There is no system in place, even manual, in order to do that, and there is no mechanism in place--there is no mechanism in place in order to ensure that the assignment is not forgotten, especially a key issue if it was manual.

And it's also not at parity. We can't reserve for ourselves. We don't reserve for retail customers. We don't reserve it for special access, so why should unbundled dark fiber have this special reservation condition?

MR. REEL: Thank you. I think we will leave that question hanging and move on to the NID. I wanted to ask a question about New York, another Verizon East state, about access to the NID in New York.

Would you be able to answer questions about that? Do you know what's going on up there?

MR. ROUSEY: On a limited basis I would be able to answer. I'm not a hundred percent up on exactly what happened in New York.

MR. REEL: Well, it appears from the Verizon contract that there's separate language for New York from what it's proposing in Virginia for access to the NID. That would be on page 101 of the Verizon material that was just circulated, coming after the dark fiber, immediately after the dark fiber.

MR. ROUSEY: I'm there.

MR. REEL: Are you aware of any reason why the New York policies couldn't be instituted in Virginia? Is there a technical or technical feasibility difference that would prevent Virginia from adopting the New York approach?

MR. ROUSEY: That was a ruling, I believe, by the New York State Commission that was against what our position was, so it did not go in Verizon's favor, is my understanding behind that.

MS. FARROBA: But the question was, was there any technical reason why--

MR. REEL: Is there any technical feasibility problem with CLECs having access to the NID?

MR. ROUSEY: The answer to that, I guess, is it would be consistent with what my answers were in testimony here in that technical feasibilities--a wide array of things, one of those being technically feasible. From a network perspective, we have the performance issues, are the same things that I'm--would have concerns with, naturally, here that we have performance measurements in place, so another company accessing our portions of the facilities are an issue.

MR. REEL: Could you say precisely what the nature of the issue is.

MR. ROUSEY: Performance measurements? Down time.

The issue is we would have facilities going up to the NID. Now, in the State of New York, I believe that the technicians in New York from the CLECs are allowed to both do terminations on our side of the facilities, with our facilities

as well as the CLEC side, so Verizon does have high concerns with another company touching our network's side of the facilities for liability reasons, et cetera, proper grounding and all kinds of issues from an operational perspective, and also down time to existing customers.

MS. FARROBA: How long have you been operating under these conditions in New York?

MR. ROUSEY: I don't know the exact time frames.

MS. FARROBA: Are you aware of any problems that have arisen as a result of operating under these conditions in New York?

MR. ROUSEY: I don't know if I'm the appropriate one to answer that. I haven't been involved in detail on those proceedings.

MS. FARROBA: Is there any of the Verizon expert panel that can answer that question?

MR. REEL: I would like to ask WorldCom--

MR. DYGART: Let the record reflect that all the witnesses said no. For clarity of the record, if nothing else.

MR. REEL: Could WorldCom explain how its techs could ground wire? Is grounding wire a technically complex operation?

MR. LATHROP: It's not. And, in fact, that's the one item that I believe the Commission referred to in the local competition order that, rather than rejecting the idea of a CLEC directly accessing the ILEC's NID, the Commission raised the grounding issue. And in our proposed contract language we said that our technicians would not remove any grounding wires.

MR. REEL: Thank you. I have some questions on subloop bundling.

First of all, I would like to ask about the feeder distribution interface. In the context of it being not inside a remote terminal but rather free-standing or mounted on some right of way that Verizon would have, now, assuming that Verizon technicians do all the work and that no CLEC technician enters the FDI, is it possible for, or would it be reasonable for a CLEC to interconnect at the FDI without having to put up its separate